



Regardless of the finality of the federal case, Ronzio continues to enjoy all the privileges afford to him under multiple state constitutions which protect his privilege against self-incrimination.

Lastly, it should be noted that this is not an unfair or unusual situation for civil litigants in cases where criminal charges have also been instituted. If there were a trial tomorrow, Ronzio would assert his privilege against self-incrimination. A future trial date does not change this fact. The taking of depositions memorializing the lack of testimony serves no purpose. The trial court will be confronted with the same issue months from now as to how to present Ronzio's assertion to the jury and how to instruct them on it. A 300 page transcript of Ronzio asserting the privilege adds nothing to this process.

**L.R. 7.1(2) CERTIFICATE**

Prior to the filing of the instant opposition, the undersigned counsel conferred with the attorney for the movants and the Parties were not able to resolve the instant dispute.

Respectfully submitted,



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Peter Charles Horstmann, Esquire  
BBO #556377  
PARTRIDGE, ANKNER & HORSTMANN  
450 Lexington Street, Suite 101  
Newton, Massachusetts 02461  
(617) 723-1980

**CERTIFICATE OF SERVICE**

I, Peter Charles Horstmann, Esquire, hereby certify that on this 2nd day of June, 2017, a copy of the foregoing motion was served electronically, upon All counsel of record.



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Peter Charles Horstmann, Esquire